

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION

FILED IN OPEN COURT  
ON 1-11-2022  
Peter A. Moore, Jr., Clerk  
US District Court  
Eastern District of NC

No. 4:22-cr-1-1M(1)

UNITED STATES OF AMERICA )

v. )

WILLIAM MICHAEL MCCOY )

INDICTMENT

The Grand Jury charges that:

Count One

On or about November 6, 2020, in the Eastern District of North Carolina, the defendant, WILLIAM MICHAEL MCCOY, did knowingly employ, use, persuade, induce, entice, and coerce E.B., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. The visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

Count Two

On or about November 14, 2020, in the Eastern District of North Carolina, the defendant, WILLIAM MICHAEL MCCOY, did knowingly employ, use, persuade, induce, entice, and coerce E.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct. The visual depiction was

transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

### Count Three

On or about November 23, 2020, in the Eastern District of North Carolina, the defendant, WILLIAM MICHAEL MCCOY, did knowingly employ, use, persuade, induce, entice, and coerce E.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct. The visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

### Count Four

On or about February 26, 2021, in the Eastern District of North Carolina, the defendant, WILLIAM MICHAEL MCCOY, did knowingly employ, use, persuade, induce, entice, and coerce E.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct. The visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

### Counts Five Through Seven

From on or about December 22, 2020, through on or about January 29, 2021, in the Eastern District of North Carolina, WILLIAM MICHAEL MCCOY, the defendant herein, did knowingly receive the following visual depictions, that is,

digital and computer images in files that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer:

Count	Date	File Name
Count 5	12/22/2020	SnapChat-1000194602.mp4
Count 6	1/13/2021	SnapChat-1374264457.mp4
Count 7	1/29/2021	3736.jpeg

The productions of the foregoing visual depictions involved the use of a minor engaging in sexually explicit conduct and were depictions of such conduct. Each entry in the above table constituting a separate violation of Title 18, United States Code, Section 2252A(a)(2).

#### Count Eight

On or about March 2, 2021, in the Eastern District of North Carolina, WILLIAM MICHAEL MCCOY, the defendant herein, did knowingly possess one or more matters, that is, computer hard drives and digital media containing digital images and videos, the production of which involved the use of one or more minors, engaging in sexually explicit conduct, and which images visually depicted such conduct. The images and videos had been mailed, shipped and transported in interstate and foreign commerce and by use of means and facilities of interstate commerce, i.e., the Internet, and were produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means

including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

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## FORFEITURE NOTICE

Upon conviction of one or more of the offenses set forth in Counts One through Eight above, WILLIAM MICHAEL MCCOY, the defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 2253(a):

1. any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of the offense(s);
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property.

The forfeitable property includes, but is not limited to: a Samsung Galaxy 10 Note phone bearing s/n RF8MA081SLW and a Toshiba Hard Drive bearing s/n 488CTZ5AT10F.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 1/11/22

MICHAEL F. EASLEY, JR.  
United States Attorney

By: Jake D. Pugh  
JAKE D. PUGH  
Assistant United States Attorney  
Criminal Division